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LEONARDO RUIZ-AMADOR
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 LEONARDO RUIZ-AMADOR,

15 Defendant.
16

Case No. 1:25-cr-00061-KES-BAM

**AMENDED STIPULATION TO CONTINUE
STATUS CONFERENCE, SET BRIEFING
SCHEDULE AND ORDER**

17
18 THE PARTIES HEREBY STIPULATE, through their respective attorneys of record,
19 Assistant United States Attorney Brittany M. Gunter, counsel for the government, and Kara R.
20 Ottervanger, counsel for Leonardo Ruiz-Amador, that this action's **Wednesday, May 28, 2025,**
21 **status conference be continued to Wednesday, September 10, at 1:00 p.m.** The parties
22 likewise ask the court to set a briefing schedule and endorse this stipulation by way of formal
23 order.

24 The parties base this stipulation on good cause. Specifically,

- 25 1. The grand jury returned an indictment regarding this matter on March 27, 2025. Dkt. 9.
26 The government prepared and delivered an initial set of discovery to defense counsel
27 within the time limits set forth by Eastern District of California Local Rule 440. The
28 defense is and has been reviewing discovery thus far provided.

2. Defense counsel intends to file pretrial motions pursuant to, *inter alia*, Federal Rule of Criminal Procedure 12(b) and Eastern District of California Local Rule Crim. 430.1. Counsel needs additional time to prepare any pretrial motion, to conduct any additional investigation in support thereof, and to continue to review discovery. Counsel expects that any such pretrial motion can be drafted and filed with the Court by June 20, 2025.
3. Counsel for the government has requested 30 days to respond to any pretrial motion filed by Mr. Ruiz-Amador. Defense counsel requests 21 days to file a reply, if necessary.
4. Therefore, the parties ask the Court to adopt the following briefing schedule:

Pretrial motions due: Friday, June 20, 2025

Responses to pretrial motions due: Monday, July 21, 2025

Reply briefs due: Monday, August 11, 2025

5. Based on the foregoing, the government does not object to the continuance.
6. The parties therefore stipulate that the period of time from May 28, 2025, through September 3, 2025, is excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED

MICHELE BECKWITH
Acting United States Attorney

Date: May 20, 2025

/s/ Brittany M. Gunter
BRITTANY M. GUNTER
Assistant United States Attorney

HEATHER E. WILLIAMS
Federal Defender

Date: May 20, 2025

/s/ Kara R. Ottervanger
KARA R. OTTERVANGER
Assistant Federal Defender
Attorney for Defendant
LEONARDO RIUZ-AMADOR

ORDER

IT IS ORDERED that the status hearing currently set for May 28, 2025, at 1:00 pm is continued until **September 10, 2025, at 1:00 pm. in Courtroom 8 (BAM) before Magistrate Judge Barbara A. McAuliffe.**

IT IS FURTHER ORDERED that the proposed briefing schedule is hereby adopted. Any pretrial motions are due by June 20, 2025; Responses are due by July 21, 2025, and Replies are due by August 11, 2025. **A motion hearing is set for September 8, 2025 at 9:30 am in Courtroom 6 (KES) before District Judge Kirk E. Sherriff.**

IT IS FURTHER ORDERED THAT the period of time from May 28, 2025, through and including September 10, 2025, is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: May 21, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE